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Counsel for Majestique Corporation

UNITED STATES BANKRUPCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

SEARS HOLDINGS CORPORATION, et al.,

Debtors.

Case No. 18-23538 (RDD)

(Jointly Administered)

MOTION FOR WITHDRAWAL AS ATTORNEY OF RECORD

TO THE HONORABLE COURT:

COME NOW, Sonia E. Colón Colón, Esq., and Camille N. Somoza Castelló, Esq., and hereby move for an order permitting the undersigned counsels to withdraw their appearance as counsel of record for Majestique Corporation in the above captioned bankruptcy cases pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules for the Southern District of New York, and in support thereto state and pray as follows:

- 1. On October 11, 2020, Kmart Holding Corporation (the "Debtor") filed an Adversary *Complaint* against Majestique Corporation (the "Adversary Proceeding", Adv. Proc. No. 20-ap-06719, ECF No. 1).
- 2. On March 16, 2021, Kmart Holding Corporation filed a *Notice of Dismissal of Adversary Proceeding* (Adv. Proc. No. 20-ap-06719, ECF No. 8).
 - 3. On March 22, 2021, the Adversary Proceeding was closed.
- 4. The undersigned counsel certify that Majestique Corporation has consented to their withdrawal as counsel of record in these cases.

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5. Therefore, the undersigned counsel respectfully request this Court enter an order granting them leave to withdraw their legal representation on behalf of Majestique Corporation and that all future notices, motions, pleadings, and orders in these cases be directed to:

Majestique Corporation Att.: Moises Zebede PO Box 190368 San Juan, PR 00919-3068

WHEREFORE, the undersigned counsel pray the Court enter an order, substantially in the form attached hereto as **Exhibit I**, granting their withdrawal as attorney of record for Majestique Corporation in the captioned cases, directing the Clerk of the Court and Prime Clerk, LLC, the authorized Claims and Noticing Agent for the Debtors, to substitute the Master Service List so that all future notices be issued to Majestique Corporation directly.

Respectfully submitted. Dated: May 14, 2021.

Ferraiuoli uc

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/s/ Sonia E. Colon Colon Sonia E. Colón Colón Admitted *Pro Hac Vice* scolon@ferraiuoli.com

-and-

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